

COMPLAINT  
NO. 1701184

THE STATE OF TEXAS  
COUNTY OF HIDALGO

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}}

MUNICIPAL COURT  
CITY OF SAN JUAN  
HIDALGO COUNTY, TEXAS

IN THE NAME AND BY THE AUTHORITY OF THE STATE OF TEXAS

I, INV. JUAN CERRILLO, do solemnly swear that I have good reason to believe and charge, that heretofore, on or about the 4<sup>TH</sup> day of APRIL, 2017, in the COUNTY OF HIDALGO AND THE STATE OF TEXAS, MARCELINO TIJERINA JR. (D.O.B 02/11/1964) did then and there, with intent to cause serious bodily injury to an individual, namely, commit an act clearly dangerous to human life that caused the death of said MARCELINO TIJERINA JR. (D.O.B 02/11/1964) again by INTENTIONALLY STRIKING THE VICTIM WITH HIS VEHICLE A 2008 RED IN COLOR VOLKSWAGON JETTA VIN # 3VWRM71K58M104333

**PROBABLE CAUSE:**

On Tuesday April 04, 2017 at around 1:18 AM, Officer Michael Quiroz was dispatched out to the 1400 block Lila Street San Juan, Texas in reference to an auto pedestrian hit and run accident. Upon arrival Officer Quiroz stated he observed a male subject, who was later identified as Marcelino Tijerina Jr. [REDACTED] laying on the roadway at the 1400 block Lila Street. Officer Quiroz stated he observed Marcelino Tijerina with his head towards the south and his feet towards the north. Officer Quiroz stated he observed Marcelino Tijerina having blood on his head area and appeared to have injuries and an injured leg. Officer Quiroz stated during his field interview he was informed by a witness Miguel [REDACTED] whom had taken a photograph of the suspect vehicle to be a 2008 Red Volkswagen Jetta displaying Texas License plates DKW4075. San Juan Police Investigators were then dispatched to the scene. Investigator Librado Casas made contact with Ari [REDACTED], whom informed he witnessed the red Volkswagen Jetta strike Marcelino Tijerina and then flee the scene. San Juan Police Investigators then began to investigate the accident as an Aggravated Assault with a deadly weapon. During the preliminary investigation it was later learned Marcelino Tijerina had passed away at the Brook Army Medical Center in San Antonio, Texas at 3:05 a.m on Thursday April 6, 2017. Investigators proceeded to the area where the incident took place to acquire further information due to a confrontation with the victim and the suspect. Investigator Juan Cerrillo proceeded to 817 Pino Street and made contact with Stacey [REDACTED] whom is common law wife to suspect Johnny Gomez-Hernandez. Due to a previous case with Mr. Hernandez and Ms. [REDACTED] Investigators were able to link Mr. Hernandez to the suspect vehicle a red in color Volkswagen Jetta displaying Texas License plates DKW4075. The vehicle matched the same description and license plate that were provided by the witness Mr. [REDACTED] Investigator Cerrillo located Mr. Hernandez and read his Miranda warnings to which he understood, signed and waived his rights. Mr. Hernandez willingly admitted he had struck Marcelino Tijerina with his red in color Volkswagen Jetta due to a confrontation with two males. Inv. Cerrillo then acquired a statement from Mr. Hernandez common law wife Ms. [REDACTED] Ms. [REDACTED] stated she had witnessed Mr. Hernandez strike Marcelino Tijerina and left the scene with a red in color Volkswagen Jetta that belonged to Mr. Hernandez. Investigators were able to recover video how the act was committed from the area along with the red color 2008 Volkswagen Jetta vehicle. The red Volkswagen Jetta appeared to have severe front windshield damage that consisted with the body set of the victim.

SWORN TO AND SUBSCRIBED BEFORE ME THIS 07 DAY OF April AFFIANT 17



[Signature]  
MUNICIPAL COURT JUDGE  
CITY OF SAN JUAN,  
HIDALGO COUNTY, TEXAS